



Eric M. Creizman

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By ECF and Email

November 2, 2022

The Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

11/2/22

Re: United States v. James Jeremy Barbera, 21-CR-154 (JGK)

Dear Judge Koeltl:

I am writing to respectfully request a brief extension of the deadline to serve and file our sentencing submission on behalf of Jeremy Barbera from today, November 2, 2022, to Friday, November 4, 2022, by 5 p.m. I am requesting this extension in order to properly complete the submission and to ensure that our client has sufficient time to review and comment on it.

I contacted counsel for the government about extending the deadline to tomorrow, November 3, and the government expressed that it has no objection. However, it has become apparent to me that all parties would be best served if we had an additional day to complete the submission. I contacted counsel for the government by email and by telephone to ask whether they would object to extending the deadline to Friday at 5 p.m., but Mr. Loss is out of the office with limited access to emails and it is likely that Ms. Fletcher has not yet seen my email or heard my voicemail. Nevertheless, because I understand that Your Honor is conducting a trial, and consequently, a full schedule, I did not want to delay this request beyond 5 p.m.

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We thank the Court for its consideration in this matter.

Respectfully submitted,
/s/ Eric M. Creizman
Eric M. Creizman (EC7684)
Melissa Madrigal (MM0200)

cc: AUSAs Kiersten Fletcher and Daniel Loss (by ECF and email)
United States Probation Officer Johnny Kim (by email)